Community Development Section: Community Development Coordinator (CDC), Community Development Specialists (CDS).

Authorization: 24 CFR Part 570, 24 CFR Part 576, Housing & Economic Recovery Act (HERA), American Recovery & Reinvestment Act (ARRA), Indiana Code, Indiana Admissive Code, City of Evansville Code.

General References:

- CPD Grantee Monitoring Handbook
- Basically CDBG
- Building HOME
- SHP Self-Monitoring Tools
- SHP Deskguide
- ESG Deskguide
- NSP guidance and tools
- Tyler Munis Guidance (financial System used)
- IDIS guidance
- Uniform Administrative Requirements (UAR)
  http://www.hud.gov/offices/cpd/affordablehousing/training/web/crosscutting/adminis
  trative/uarintro.cfm
- Homeless Resource Exchange
- HOME Technical Assistance
- Small Business Administration Standards of Operating Procedures
- NOFAs
- Research best practices of other cities and similar projects
- 2010-2014 Consolidated Plan for City of Evansville DMD

Partnerships/Stakeholders:

- Federal Government: Department of Housing and Urban Development (HUD)
  (For Historical also Department of Interior, for environmental also Environmental
  Protection Agency, etc.)
- State of Indiana (State Board of Accounts, Indiana Housing & Community Development
  Authority, Department of Administration, Indiana Finance Authority, Indiana
  Department of Labor, Legislative Services Agency, etc.)
- Other local units/departments of government

- Agencies that receive funding
- Individual clients of services provided by agencies that receive funding
- Neighborhoods
- Community in general
- Vendors/Contractors/Consultants/Professional Services
- Agencies and foundations that impact funding and match received.
- Landlords

Eligibility:

- Eligibility is determined and established beforehand-during the initial application phase and before signing contracts with the agency:

  Proposals are submitted by agencies and sub recipients through the Request for Proposal Process as appropriate for the funding source. Public Services are submitted through the Public Services process as stated in the Public Services SOP. Non Public Services are submitted through Non Public Services process as stated in the Non Public Services SOP.

  Income verification, Income determination, Conflict of Interest, Match requirements, Ability of project to succeed, Capacity, etc. are determined beforehand.

  For new projects, HUD, State Board of Accounts, and appropriate partners, depending on the specific project, are contacted to ensure that a new project is eligible.

  UAR and General HUD rules are always checked, in addition to program specific rules, policies, and guidelines to determine eligibility To be eligible, the proposal must fall under the HUD national objectives and overall caps for DMD such as 15% cap for public services.

  If tied to a competitive application, the Notice of Funding Opportunity (NOFA) and application specific requirements also determine eligibility.

- Eligibility is monitored through the claims process on an on-going basis:

  Every claim is reviewed for eligibility when submitted to the CDS by the agency. For CDBG and ESG in particular, refer to Policy and Procedures for Agency Monitoring Reports, Annual Audits and Reimbursement. Claims are not processed until approved by the CDS. Claims are also subject to the audit process as outlined in the Audit SOP. Addresses are checked on each claim to determine if it falls in an eligible geographical area as appropriate.

Monthly monitoring reports are required by each agency.

Projects that require verifications after the beginning of the project are tied to the claims process and monthly monitoring reports.

- Eligibility is continually monitored with on-site inspections of the facilities of the agencies and with tracking through various databases such as Homeless Management Information Services (HMIS) as appropriate to the project.

CDS perform on-site inspections of agencies that receive funding through City of Evansville DMD Community Development. In addition, based on the schedule required by the funding source, inspectors do a specific housing quality inspection of the physical site.

CDS on-site inspections should include a check to ensure that agencies have complied with changes during the grant year such as appropriate for the funding source for the project such as conflict of interest for incoming new staff or changes in income for income verification.

CDS perform at least one general inspection annually for general public services. Construction projects require more frequent on-site monitoring at various stages throughout the process.

Eligibility is also checked with conversations with agency clients that benefit from the services provided : to verify that clients are receiving services as stated by the agency; to receive feedback on the quality of the services and recommendations for improvements; and to ensure that the agency is doing what they proposed with funding.

Funding Allocation:

All allocations are approved by City Council.   Allocations are approved only as specific projects. Monitoring of the funds is done while monitoring the project as a whole.

Workload/Focus:

The CDC coordinator assigns agencies to each CDS. The agency will only work with the one CDS that is assigned to their agency. Most agencies have several projects that receive funds.

Monitoring is done at the project level. Most projects have several funds such as CDBG, NSP, HOME, ESG, etc. A spreadsheet is maintained on an on-going basis by each CDS for each project.

Specific funds are sub-monitored as part of each project by the Community Development Section.

Many projects also receive funding through the State of Indiana. The CDS assigned to the project works on an ongoing basis in conjunction with corresponding staff at the State of Indiana.

Reports Impact Monitoring: Various reports are required depending on the project and funding source. Reports are done as required for each fund type. See Reporting Timeline for list of reports. For example, ARRA requires quarterly reports. Also for example Office of HUD SNAP requires annual homeless reports such as Point In Time, Housing Inventory Chart, and Annual Progress Reports. Actions Plans are required annually. In addition, various reports can be pulled from IDIS.Reports may directly influence monitoring if the report reveals problems, gaps, lateness, discrepancies, patterns, etc. Agencies are contacted directly to discuss and explain problems or potential problems.

Compliance: Prevention is the preferred method of compliance. CDS maintain a close and open relationship with their assigned agencies. Agencies are encouraged to bring up potential issues before they become problem. Agencies that discover problems are encouraged to bring them to the attention of CDS as soon as they are discovered. Agencies also submit progresses and issues in their monthly monitoring reports.

In addition to eligibly, Each and every claim is reviewed for compliance when submitted by the agency by the CDS. Claims are not processed unless approved by the CDS. Claims are also subject to the audit process as stated in the Audit SOP. Addresses are checked on each claim to determine if it falls in an eligible geographical area as appropriate.

Potential or less serious issues are handled through an informal process of e-mails, phone calls, and meetings with director and staff of the agency. CDS work directly with the agency back and forth to resolve the issue in a timely manner.

Serious issues are handled through a written process to the director of the agency by the CDC. Firm deadlines are established in writing that the agency must comply with to correct the issue. Funding for the project can be withheld if the agency does not maintain compliance. On-going non-compliance will result in loss of funds for the agency.

Risk analysis is also a part of compliance. Agencies that are having troubles or have more complex requirements are monitored more frequently. High-risk projects are monitored more frequently. Agencies or projects that place more demands on the City of Evansville receive more frequent monitoring.

Physical Inspections:

For Construction Projects: Physical inspection of the site prior to the project, physical visits and pictures documenting progress of the project, and post inspection by DMD to ensure that work has been completed in compliance with agency's agreement with DMD.

For public services that have housing: Physical inspection of the actual sites where services are being delivered is done at least annually. For a homeless shelter/transitional housing, 20% or more of housing units are inspected to make sure that the housing units meet minimum living standards such as housing quality standards (HQS), and environmental, health, and safety standards. For public services that also used HOME funds and are they are still in affordability, a DMD inspector will inspect housing units as required by HOME.

For public services that are non-housing, the physical site is measured against the proposal given by the agency. For instance, day cares are expected to be operating a day care, serving the number of children proposed, maintaining staff ratio as proposed, meeting reasonable expectation of general environmental, health, and safety requirements such as hand rails and safety guards if needed. Does the facility have the capacity to fulfill their claims made to DMD for services. Is the public service open at the hours in the proposal, for instance a night program is open at night. For a day shelter, are meals being served at proposed levels, are laundry facilities in place as indicated in the proposal.

Each public service checklist will be case by case depending on what specific services were proposed to DMD, and the physical inspection checks that the physical site and observation of the service(s) proposed are in agreement with the agency's proposal to DMD.

Affordability Period: A DMD inspector will monitor units as required by HOME funds based on the total number of units in the project.

Training Requirements: Agencies that receive funding vary widely in the educational background and readiness of staff. Some agencies rely mainly on paid staff, while other agencies rely mainly on volunteers.

Monitoring in general has revealed the importance of having quality, dedicated, and well-trained staff for projects paid with funds through the City of Evansville DMD. Capacity and the ability of an agency to run a program or be in compliance is tied to the quality of training.

A new focus on looking at training and educational background of staff and volunteers, will impact monitoring in the future. Future requests for proposals will include information pertaining to training and educational background of staff and volunteers that will run the

project.   Agencies will be required to attend a training meeting focused on the claims process prior to applying for funds.

IDIS: IDIS is a vital part of the monitoring process throughout each step. The set-up of IDIS is established after eligibility determination by CDS. IDIS is checked throughout the process against spreadsheets and checked against other reports by CDS. Various reports are ran in IDIS on an on-going basis and checked for monitoring issues and overall patterns. IDIS is especially crucial when closing an activity when assessing the overall success of a particular project.

Timeline/Calendar: Due to the nature of projects containing multiple fundings sources, projects are monitored annually or more frequently.

Services primarily have one funding source from the City of Evansville. CDBG services are monitored in December & January. ESG funds are monitored in February & March. SHP funds are monitored in April. Claims are anticipated to start arriving for reimbursement in May, assuming that HUD is on schedule.

Construction projects such as HOME and NSP are monitored at initial application, pre-construction, and several points during construction, and post construction. Monitoring of the actual physical site will occur at various points of construction. Pre-construction including historical review and environmental review and clearance. Projects are monitored as a whole. Construction funds may be continued to be monitored if the project receives operations funding. Program income must be spent first and program monitored is monitored separately through files kept by the agency primarily.

Specialized funds such as HPRP are monitored much more frequently, through HMIS monthly, and files quarterly. CDBG-R is monitored similar to construction projects.

Affordability period and IDIS master check are scheduled in the summer.

Proposal for the upcoming year start in June and many are weeded out at this stage. Approval by City Council is in September or October.

All funds are looked at that are included in the project. All projects are monitored for general requirements such as lead and code violations.

Additional Requirements: Homeless agencies are required to undergo further monitoring conducted by the Standards of Care Committee as part of the Homeless Services Council of Southwestern Indiana. Letter grades are assigned to the agency. See the Standards of Care attachment. The indicators were modified by the Standards of Care Committee from indicators published by Corporation of Supportive Housing.